

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

<p>RALPH STRANO, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>KIPLINGER WASHINGTON EDITORS, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 21-cv-12987-TLL-PTM</p> <p>Hon. Thomas L. Ludington</p> <p>Mag. Judge Patricia T. Morris</p>
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**UNOPPOSED MOTION FOR LEAVE TO FILE ENLARGED BRIEF IN
SUPPORT OF PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Ralph Strano (“Plaintiff”), through his counsel, hereby moves the Court for leave to file an enlarged brief, not to exceed 34 pages, in support of his unopposed motion for preliminary approval of class action settlement. In support of this Motion, Plaintiff states as follows:

1. As set forth in Plaintiff’s forthcoming Unopposed Motion for Preliminary Approval of Class Action Settlement, the Parties have reached agreement on a class-wide settlement, which, if approved, will fully and finally

resolve all claims against Defendant Kiplinger Washington Editors, Inc. (“Defendant”) related to the Michigan Preservation of Personal Privacy Act.

2. Plaintiff has made his greatest effort to keep his preliminary approval brief as succinct as possible. However, Plaintiff believes in good faith that the filing of a brief in excess of 25 pages is necessary to fully and effectively (i) set forth the material terms of the Parties’ settlement agreement, (ii) demonstrate that the proposed settlement class warrants certification under Rule 23(b)(3) for settlement purposes, and (iii) demonstrate that the Parties’ proposed settlement warrants preliminary approval under Rule 23(e) and relevant Sixth Circuit precedent. *See* E.D. Mich. LR 7.1(d)(3)(A). As such, Plaintiff’s Motion is 34 pages in length, inclusive of signatures.

3. Plaintiff’s counsel conferred with counsel for Defendant, communicating via email, on July 4, 2022. Defendant does not oppose this motion nor to the relief requested herein.

THEREFORE, Plaintiff respectfully requests that the Court enter an Order granting him leave to file an enlarged brief, not to exceed 34 pages, in support of his forthcoming Unopposed Motion for Preliminary Approval of Class Action Settlement.

Dated: July 5, 2022

Respectfully submitted,

By: /s/ E. Powell Miller
One of Plaintiff’s Attorneys

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Proposed Class Counsel

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**BRIEF IN SUPPORT OF UNOPPOSED MOTION FOR
LEAVE TO FILE ENLARGED BRIEF IN SUPPORT OF
PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, by and through his undersigned attorney, and in support of his Unopposed Motion For Leave to File Enlarged Brief in Support of Plaintiff’s Unopposed Motion For Preliminary Approval of Class Action Settlement, relies on the content of Plaintiff’s Motion.

Dated: July 5, 2022

Respectfully submitted,

By: /s/ E. Powell Miller
One of Plaintiff’s Attorneys

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CERTIFICATE OF SERVICE

I, E. Powell Miller, an attorney, hereby certify that on July 5, 2022, I served the above and foregoing on all counsel of record by filing it electronically with the Clerk of the Court using the CM/ECF filing system.

/s/ E. Powell Miller

E. Powell Miller

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